



Air Quality Permitting Response to Public Comments

January 11, 2019

**Tier I Operating Permit No. T1-2007.0118
Project 0118**

**The Amalgamated Sugar Company - Nampa
Nampa, Idaho**

Facility ID No. 027-00010

Prepared by:
Kelli Wetzel, Permit Writer
AIR QUALITY DIVISION

Final

Table of Contents

BACKGROUND.....	3
PUBLIC COMMENTS AND RESPONSES.....	3
APPENDIX	6

BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed Tier I renewal for The Amalgamated Sugar Company - Nampa from October 10, 2018 through November 9, 2018, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

<http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: Tank 10 PTC, P.C. 2.2

Please remove all references to the Tank 10 PTC in the permit including Permit Condition 2.2 bullet 4, (Permit to Construct No. P-030062, issued January 12, 2004). References to Tank 10 are also included in Table 2.1 Permit Section 9 and on page 30 in the first paragraph in the "Summary Description."

Response 1: The requested changes have been made.

Comment 2: Flume Slaker, Table 11.2

Fume Slaker is incorrect. Replace with "Flume Slaker." Also see Pg 10 of the SOB.

Response 2: The requested changes have been made.

Comment 3: Conflicting Test Schedules, P.C. 5.15, 5.16, 10.9, 10.10

Riley Boiler Permit Condition 5.15. The performance test for PM10 is required to be conducted no later than 18 months after coal firing begins. Also see Pg 18 of SOB.

Riley Boiler Permit Condition 5.16 (bullets 1 & 2), 5.17 state that performance test for PM10, NOx, CO (lbs/hour), CO (ppm) and TSM respectively will be conducted within 180 days of initial startup of Coal-Firing LNBs.

Riley Boiler Permit Condition 10.9 (j) and 10.10 (g) state that affected sources that have not operated more than one year since the previous compliance demonstration must complete that no later than 180 days after the re-start of the affected source.

Riley Boiler reference to 40 CFR 63.7510(k) states that affected sources that switch subcategories must demonstrate compliance within 60 days of the effective date of the switch. [Note this subsection is omitted from Permit Condition 10.9].

The conflicting testing schedules imposed on the Riley Boiler do not align. The most stringent timeline for testing is established by 40 CFR 63.7510(k), although this subsection is not included in the Permit, only the SOB. TASCOS may begin coal firing in the Riley boiler during Spring 2019, following completion of the current beet campaign. Optimum testing conditions

for compliance demonstrations will not occur again until after the next campaign commences in the Fall of 2019, however. Therefore, TASCOS request the following be added to the Permit as 5.22:

In light of the conflicting compliance testing schedules applicable to the Riley Boiler when coal firing commences, this Permit Condition 5.22 shall govern the testing schedule. If TASCOS begins firing coal on the Riley Boiler, all compliance demonstrations required by BART, MACT, and this Permit shall be conducted within 60 days of the effective date of the switch or within 60 days of commencement of the next beet campaign, whichever is later.

Response 3: DEQ acknowledges there is a conflict in test scheduling requirements for the Riley boiler from the BART permit and the MACT schedule. The citation from 40 CFR 63.7510(k) has been added to Permit Condition 10.9 and is the most stringent timeline for testing requirements for the Riley boiler. Because the MACT requirements are the most stringent testing requirements, an additional permit condition is not necessary. A comment clarifying the testing schedule has been added in the Statement of Basis.

Comment 4: SOB, Pg 27-75

Section 7.6 Boiler MACT applicability. Throughout this section, requirements for the Riley boiler need to be clarified for the natural gas versus coal firing. Since June 2015, the Riley boiler has been fired by natural gas only. As a result, only limited work practice (energy assessments, boiler tune up), notifications, and reporting requirements apply. Coal firing is targeted to restart during the spring of 2019 following the start-up and commissioning of low NO_x burners and will likely be an intermittent fuel source for the Riley. Therefore add "when firing coal" for IDEQ narratives following requirements applicable to coal firing (e.g. emission limits, fuel monitoring etc.)

Response 4: Clarifications have been made in the SOB for requirements when the Riley boiler is firing coal versus natural gas.

Comment 5: SOB, Pg 35

Following section (k) in the fourth sentence of the second paragraph, the SOB states: "The boiler's initial source tests were due July 29, 2016 (180 days after the compliance date)." TASCOS requests substituting the following language: "The Riley boiler has fired natural gas only since June 2015. In the event that the boiler fuel is switched, TASCOS shall comply with this subsection."

Response 5: The requested change has been made.

Comment 6: SOB, Pg 37

Following (i) at the top of the page the second sentence states, "Both B&W boilers and the Union boiler are subject to the annual tune-up." All three of these boilers are equipped with oxygen combustion trim systems qualifying them for five year tune ups. TASCOS requests replacing the above sentence with the following "Both B&W boilers and the Union boiler are equipped with oxygen trim systems and therefore are subject to a five year tune-up schedule".

Response 6: The requested change has been made.

Comment 7: SOB, Pg 71

Just before Section 63.7555, the SOB states: "TASCO must submit semi-annual reports specified in Table 9 for the Riley boiler. The first semi-annual report was due on January 31, 2017." TASCO requests the following revision: "When boilers are firing natural gas, including the Riley boiler, semi-annual reports are not required. When firing coal in the Riley boiler, semi-annual reports will be submitted in accordance with the rule."

Response 7: The requested change has been made.

Appendix

Public Comments Submitted for

Tier I Operating Permit

T1-2007.0118



Amalgamated Sugar
Pure. Sweet. Grower-Owned.

November 9, 2018

Kelli Wetzel, Permit Writer
Air Quality Division
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: Comments for Draft Tier I Permit Renewal (No. T1-2007.0118)
The Amalgamated Sugar Company LLC, Nampa Facility, Docket No. AQ-1631

Dear Ms. Wetzel:

TASCO has completed the review of the Public Comment draft Tier I renewal permit and provides the attached comments for your consideration:

Please call either Kyle Bair at (208) 468 6844 or me at (208) 466-3541 if you have any questions regarding these comments.

Sincerely,

Kyle Bair for ERIC ERICKSON

Eric C. Erickson, PE, CEM
Plant Manager
The Amalgamated Sugar Company LLC
Nampa Facility

cc: Boise -- Dean DeLorey, Gary Lowe, Glen Patrick
Nampa-- Kyle Bair

THE AMALGAMATED SUGAR COMPANY LLC
138 West Karcher Rd. • Nampa, ID 83687 • Phone: (208) 466-3541 • Fax: (208) 466-0295

Comments on Draft Tier I Permit and Statement of Basis ("SOB")

Permit # T1-2007.0118

The Amalgamated Sugar Company LLC

Nampa Idaho Facility (027-00010)

- Pgs 5, 6, & 39 Tank 10 PTC Please remove all references to the Tank 10 PTC in the permit including Permit Condition 2.2 bullet 4, (Permit to Construct No. P-030062, Issued January 12, 2004). References to Tank 10 are also included in Table 2.1 Permit Section 9 and on page 39 in the first paragraph in the "Summary Description".
- Pg 72 Table 11.1 Fume Slaker is incorrect. Replace with "Flume Slaker." Also see Pg 10 of the SOB.

CONFLICTING TEST SCHEDULES

- Pg 28 Riley Boiler Permit Condition 5.15. The performance test for PM10 is required to be conducted no later than 18 months after coal firing begins. Also see Pg 18 of SOB.
- Pgs 28 Riley Boiler Permit Conditions 5.16 (bullets 1 & 2), 5.17 state that performance test for PM10, NOx, CO (lbs/hour), CO (ppm) and TSM respectively will be conducted within 180 days of initial startup of Coal-Firing LNBs.
- Pgs 49 & 51 Riley Boiler Permit Condition 10.9 (j) and 10.10(g) state that affected sources that have not operated more than one year since the previous compliance demonstration must complete that no later than 180 days after the re-start of the affected source.
- SOB Pg 35 Riley Boiler Reference to 40 CFR 63.7510(k) states that affected sources that switch subcategories must demonstrate compliance within 60 days of the effective date of the switch. [Note this subsection is omitted from Permit Condition 10.9.]

The conflicting testing schedules imposed on the Riley Boiler do not align. The most stringent timeline for testing is established by 40 CFR 63.7510(k), although this subsection is not included in the Permit, only the SOB. TASCO may begin coal firing in the Riley Boiler during Spring 2019, following completion of the current beet campaign. Optimum testing conditions for compliance demonstrations will not occur again until after the next campaign commences in the Fall of 2019, however. Therefore, TASCO requests the following be added to the Permit as 5.22:

In light of the conflicting compliance testing schedules applicable to the Riley Boiler when coal firing commences, this Permit Condition 5.22 shall govern the testing schedule. If TASC0 begins firing coal on the Riley Boiler, all compliance demonstrations required by BART, MACT, and this Permit shall be conducted within 60 days of the effective date of the switch or within 60 days of commencement of the next beet campaign, whichever is later.

SOB COMMENTS

- SOB Pg 27-75 Section 7.6 Boiler MACT Applicability. Throughout this section, requirements for the Riley boiler need to be clarified for the natural gas firing verses coal firing. Since June 2015, the Riley boiler has been fired by natural gas only. As a result, only limited work practice (energy assessments, boiler tune up), notifications, and reporting requirements apply. Coal firing is targeted to restart during the spring of 2019 following the start-up and commissioning of low NOx burners and will likely be an intermittent fuel source for the Riley. Therefore add "when firing coal" for IDEQ narratives following requirements applicable to coal firing (e.g. emission limits, fuel monitoring etc.)
- SOB Pg 35 Following Section (k) in the fourth sentence of the second paragraph, the SOB states: "The boiler's initial source tests were due July 29, 2016 (180 days after the compliance date)." TASC0 requests substituting the following language: "The Riley boiler has fired natural gas only since June 2015. In the event that the boiler fuel is switched, TASC0 shall comply with this subsection."
- SOB Pg 37 Following (i) at the top of the page the second sentence states, "Both B&W boilers and the Union boiler are subject to an annual tune-up". All three of these boilers are equipped with oxygen combustion trim systems qualifying them for five year tune ups. TASC0 requests replacing the above sentence with the following "Both B&W boilers and the Union boiler are equipped with oxygen trim systems and therefore are subject to a five year tune-up schedule".
- SOB Pg 71 Just before Section 63.7555, the SOB states: "TASC0 must submit semi-annual reports specified in Table 9 for the Riley boiler. The first semi-annual report was due on January 31, 2017." TASC0 requests the following revision: "When boilers are firing natural gas, including the Riley boiler, semi-annual reports are not required. When firing coal in the Riley boiler, semi-annual reports will be submitted in accordance with the rule."